



December 8, 2015

Pamela Creedon, Executive Director  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Dr #200,  
Rancho Cordova, CA 95670  
SENT VIA EMAIL TO: Keri.yee@waterboards.ca.gov

**Re: Nitrogen Management Plan Summary Report Template**

Dear Ms. Creedon,

We thank you for the opportunity to comment on the Draft Nitrogen Management Plan Summary Report Template (NMPT). Our organizations are extremely interested in the reporting requirements, as these will provide the most critical information of the program, and form the basis for the coalition reports to the state.

Our goal in having this information transmitted is two-fold;

- 1) To gain an understanding of the potential for nitrogen loss to the environment (particularly groundwater)
- 2) To gain an understanding of the current range of nitrogen application on specific crops, and identify growers whose practices may need improvement.

Having participated in the Nutrient Management Plan Technical Advisory Work Group over the summer, we concur with the conclusion of that group that, at the current time, the most accurate ratio for growers to report is Nitrogen Applied:Yield. While this number does not provide direct data on potential nitrogen loss to the environment, the coalitions can estimate that number using accepted or developed metrics for other sources of Nitrogen removed from a field.

We do disagree with the proposal to define "nitrogen applied" as only those forms of nitrogen directly added to the crop. As defined, this value does not include nitrate present in irrigation water, which can provide a significant amount of nutrient to the crop. We agree that growers should receive credit for using nitrogen in groundwater to satisfy all or part of their crop requirement; indeed this may be the only way to effectuate a reduction in nitrate concentrations in groundwater. However, if the nutrient ratio is to be used to compare the effectiveness of nitrogen use between growers, the number must account for all major sources



of nutrients. Therefore, we suggest that the two nitrogen values be reported separately, but using jointly to arrive at the nutrient ration.

We suggest therefore that the summary report be changed as follows

- 1) Add a column titled "N, Irrigation Water"
- 2) Change the A/Y column calculation to  
$$(\text{Total Available N Applied} + \text{N, Irrigation Water}) / \text{Actual Yield}$$

Thank you for providing us the opportunity to comment on this document

Sincerely,

Phoebe Seaton  
Leadership Counsel for Justice and Accountability

Laurel Firestone  
Co-Executive Director and Attorney at Law  
Community Water Center

Jennifer Clary  
Water Policy Analyst  
Clean Water Action